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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

KATHLEEN HANNI, individually and on
behalf of all others similarly situated,
TIMOTHY T. HANNI, CHASE L.
COSTELLO, and LANDEN T. HANNI, a
minor, by and through his parent and Natural
Guardian, Kathleen Hanni,

Plaintiffs,

vs.

AMERICAN AIRLINES, INC., and DOES 1
through 20, inclusive,

Defendants.

CASE NO. C 08-00732 CW (EDL)

~~STIPULATED REQUEST FOR ORDER~~
CHANGING TIME AS MODIFIED

Local Rule 6-2

Pursuant to Civil Local Rule 6-2, Plaintiffs Kathleen Hanni, Timothy Hanni, Chase Costello, and Landen Hanni (collectively "Plaintiffs") and defendant American Airlines, Inc. ("American") hereby stipulate and request that the Court issue an order changing time ("Order") on American's Motion to Compel, filed with this Court on March 3, 2009, which has not yet been set by the Court for hearing. The parties request that American's Motion to Compel, along with

American's Motion for Sanctions and Plaintiffs' Motion to Compel and Motion for Protective Order (as detailed below) be heard by this Court on March 24, 2009 at 9:00 a.m.

1. Whereas, an order shortening time is necessary in this instance because the date by which the Court has ordered the parties to complete all class certification discovery is April 16, 2009. (*See* Case Management Order, Docket #110.) The parties wish to have their motions resolved with sufficient time before class certification discovery cutoff date for follow-up discovery if necessary.

2. Whereas, the parties request that the Court adopt the following shortened hearing and briefing schedule on American's Motion to Compel:

- a. March 13, 2009 – deadline for Plaintiffs to file opposition brief
- b. March 18, 2009 – deadline for American to file reply brief
no later than 4:00 p.m.
- c. March 24, 2009 at 9:00 a.m. – hearing on American's Motion to Compel

3. Whereas, American will file its Motion for Sanctions pursuant to Local Rule 37-3 on March 11, 2009 and requests that its Motion for Sanctions be heard with its Motion to Compel. Plaintiffs also intend to file a Motion to Compel against American relating to their Request for Production of Documents and a Motion for a Protective Order on March 11, 2009 and request that Plaintiffs' Motion to Compel and Motion for a Protective Order be heard on the same day and time as American's Motion to Compel and Motion for Sanctions for the same reasons cited above. The parties therefore request that the Court adopt the following shortened hearing and briefing schedule on Plaintiffs' Motion to Compel and Motion for Protective Order and American's Motion for Sanctions:

- a. March 11, 2009 – Plaintiffs to file their Motion to Compel and Motion for a Protective Order and American to file its Motion for Sanctions.
- b. March ~~18~~¹⁶, 2009 – parties to file their opposition briefs.
- c. March ~~20~~¹⁸, 2009 – parties to file their reply briefs.
no later than 4:00 p.m.
- d. March 24, 2009 at 9:00 a.m. – hearing on Plaintiffs' Motion to Compel;

4. No other time modifications related to these motions have been requested by the parties.

5. The Order requested by the parties would not have an impact on any other dates set by the Court in this case.

For the reasons stated above, the parties respectfully request that the Court grant their stipulated request for order changing time so that Plaintiffs' and American's Motion to Compel and American's Motion for Sanctions can be heard as expeditiously as possible.

DATED: March 9, 2009

COOPER, WHITE & COOPER LLP

By: /s/
Jie-Ming Chou
Attorneys for Defendant American Airlines, Inc.

DATED: March 9, 2009

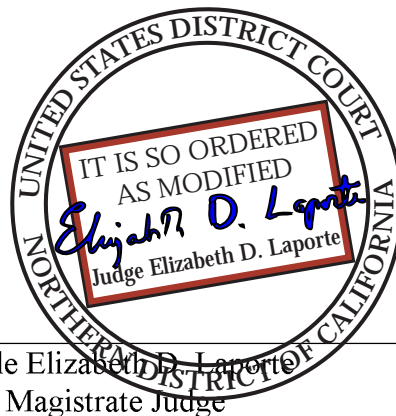
LAW OFFICES OF DAVID G. RAMOS
By:

/s/
David Ramos
Attorneys for Plaintiffs Kathleen Hanni,
Timothy Hanni, Chase Costello, and Landen
Hanni

ORDER

PURSUANT TO THIS STIPULATION, IT IS SO ORDERED.

Dated: March 9, 2009



Elizabeth D. Laporte
The Honorable Elizabeth D. Laporte
United States Magistrate Judge